

MCNAIR  
ATTORNEYS

December 7, 2015

Margaret M. Fox

pfox@mcnair.net  
T 803.799.9800  
F 803.753.3278

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Application of AltaWorx, LLC for a Certificate of Public Convenience  
and Necessity to Provide Resold Local Exchange, Exchange Access and  
Interexchange Telecommunications Services in the State of South  
Carolina, for Alternative Regulation and for Flexible Regulation  
Docket No. 2015-393-C

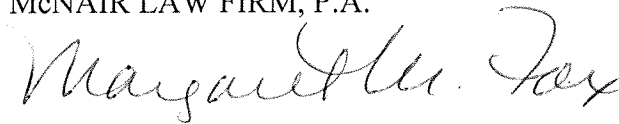
Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone  
Coalition (the "Coalition"), a Petition to Intervene in the above-referenced  
docket. By copy of this letter and Certificate of Service all parties of record will  
receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:dmf  
Enclosure

McNAIR LAW FIRM, P.A.  
1221 Main Street  
Suite 1600  
Columbia, SC 29201

Mailing Address  
Post Office Box 11390  
Columbia, SC 29211

mcnair.net

COLUMBIA 1237936v1

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2015-393-C

Re: Application of AltaWorx, LLC for a	)	
Certificate of Public Convenience and	)	
Necessity to Provide Resold Local	)	
Exchange, Exchange Access and	)	
Interexchange Telecommunications	)	
Services in the State of South Carolina,	)	
for Alternative Regulation and for	)	
Flexible Regulation	)	
<hr style="width:40%; margin-left:0"/>		

**PETITION TO INTERVENE**

In response to the Commission's Notice of Filing of the Application of AltaWorx, LLC for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State of South Carolina, for Alternative Regulation and for Flexible Regulation in the State of South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would

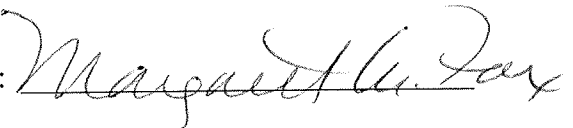
potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800  
[jbowen@mcnair.net](mailto:jbowen@mcnair.net)  
[pfox@mcnair.net](mailto:pfox@mcnair.net)

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

December 7, 2015

Columbia, South Carolina

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2015-393-C

Re: Application of AltaWorx, LLC for a )  
Certificate of Public Convenience and )  
Necessity to Provide Resold Local )  
Exchange, Exchange Access and )  
Interexchange Telecommunications )  
Services in the State of South Carolina, )  
for Alternative Regulation and for )  
Flexible Regulation )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I, Dennie Fyfe, do hereby certify that I have this date served one (1) copy of the foregoing  
Petition to Intervene upon the following parties of record by causing said copies to be deposited in  
the United States Mail, First Class, postage prepaid to:

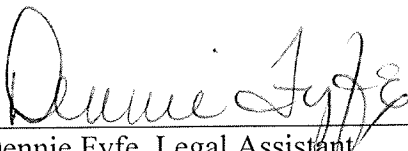
John J. Pringle, Jr., Esquire  
Adams and Reese, LLP  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, SC 29201

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

Counsel for Applicant AltaWorx, LLC

Judith A. Riley  
Telecom Professionals, Inc.  
P.O. Box 720128  
Oklahoma City, OK 73172-0128

For Applicant AltaWorx, LLC

  
\_\_\_\_\_  
Dennie Fyfe, Legal Assistant  
McNair Law Firm, P. A.  
Post Office Box 11390  
Columbia, South Carolina 29211

December 7, 2015  
Columbia, South Carolina